



U.S. DEPARTMENT OF THE INTERIOR
Office of the Secretary
National Business Center



MAR - 6 2007

Leonard M. Moore Jr.
Area Director
Occupational Safety and Health Administration (OSHA)
1099 Winterson Road, Suite 140
Linthicum, MD 21090-2218

Dear Mr. Moore:

This responds to your letter of February 27, 2007, to Mr. Paul Hoffman, Deputy Assistant Secretary for Performance, Accountability, and Human Resources at the Department of the Interior. This letter provides the results of our investigation into the alleged conditions specified in your letter and communicates the status of efforts to address them.

The Department of the Interior takes all matters involving the health, safety, and well-being of Interior employees and visitors to its facilities seriously. As a result, the Department has been implementing a comprehensive three-pronged environmental management approach. The approach encompasses: (1) establishing policy, (2) performing audits to verify conditions, and (3) improving areas that are deficient. Consistent with Departmental policy, an audit of environmental and safety conditions at the Department's Main and South Interior Buildings (Interior Complex) was completed during January 2007. It is important to note that this audit was conducted by management's initiative within the comprehensive environmental-management approach to identify any deficiencies so they may be corrected. The items specified in your letter appear to have been taken from the draft audit report which the Department received on Friday, January 26, 2007. On Tuesday, January 30, 2007, facilities management staff met to begin the process of assessing the findings and initiate corrective actions.

A corrective action team was formed at the end of January and met initially on February 7, 2007, to complete the assessment of the findings contained in the draft report and begin the development of an action plan. Included in this meeting were representatives from each of the organizations that will ultimately have responsibility for completing the actions specified in the action plan. To ensure timely and focused follow-through on the implementation of an action plan, the Washington, DC, area Building Manager has been assigned to lead this team and work on this project on a full-time basis until the actions have been completed.

As a means of effectively communicating with employees, several notifications of the audit were provided to occupants of the Interior Complex prior to the initiation of the audit work. In addition, a meeting was held on March 1, 2007, and was open to all occupants of the Interior Complex to review the audit findings and the status of the plan of action to address them. In addition, the current status of corrective efforts will be a regular topic of discussion at the bi-

monthly Tenant Users Group meetings which also are open to all Interior Complex occupants. A formal response to the draft audit report will be completed and forwarded to the auditors by April 2, 2007, and the final report is expected to be completed within 30 days of this date.

In addition to the above, we have aggressively initiated action on the draft findings. The following addresses the eight items specified in your letter.

Item 1. 25 one-gallon containers of gasoline are being stored with flammable and combustible paints/sealers, PVC cement, and zinc coating.

The draft report does not state that there are 25 one-gallon containers of gasoline on site at the Interior Complex. The draft report indicated "Gasoline is stored in" one room and, "Approximately 25 1-gallon containers of flammable and combustible paints and sealers, PVC cement, and zinc coating are stored in" another room. On February 23, 2007, the Department issued a Reimbursable Work Authorization to GSA to use its existing contractor(s) to begin the work needed to remedy this general finding. GSA, in turn, issued a task order to a qualified contractor to identify the types of hazardous materials, package them into approved containers, and staged various items for removal from the buildings. The removal of the materials by GSA's licensed disposal-contractor began on Saturday, March 3, 2007, and will be completed by March 10, 2007. The materials that still remain on-site awaiting disposition have been separated by characteristics and distance, as appropriate.

Item 2. Flammable and Combustible Paints stored on open shelves.

The Interior Complex spaces identified in the draft report have been surveyed to identify all paints by type and characteristics. All excess flammable and combustible paints in the Interior Complex have been moved to staging areas awaiting pickup and proper disposal by the GSA contractor. As stated above, this removal work by the licensed disposal contractor has begun and is planned for completion by Saturday, March 10, 2007. The materials that remain on-site have been separated by characteristics and distance, as appropriate.

Item 3. Flammable aerosols and alcohol are stored on shelves.

A survey of the mechanical spaces at the Interior Complex has been completed and all flammable, combustible, and corrosive materials have been identified. The excess materials have been moved to staging areas awaiting pickup and proper disposal by the GSA contractor. Work to identify, package (for shipping), and remove these materials began on March 5, 2007, and will be completed by March 10, 2007. The materials have been separated by characteristics and distance until removal from the buildings. We have ordered additional approved cabinets for the proper storage of flammable and corrosive materials, and anticipate delivery by March 30, 2007.

Item 4. *Hundreds of spent fluorescent lamps which contain mercury are piled up in building.*

The spent fluorescent lamp tubes have been collected from all locations within the Interior Complex and relocated to a staging area awaiting pickup. They are scheduled to be picked up by the GSA disposal contractor by Saturday, March 10, 2007.

Item 5. *Underground electrical equipment in wet areas.*

During their audit, the inspectors found a battery-powered floor scrubber that was being recharged while the battery charger was located on a wet concrete floor. The hazards associated with this situation were corrected on January 29, 2007. The battery charger is now positioned several feet above the floor on a rack built for the charger and the power cord is no longer on the floor.

The inspectors also noted that three duplex receptacles in the library did not have a grounding plug. These receptacles were retrofitted with three-prong, grounded receptacles on February 27, 2007. Additionally, outlets located in bathrooms, kitchenettes with sinks, and outside outlets in the portion of the Main Interior Building that has yet to undergo renovation and the entire South Interior Building are being checked to determine to if they have a GFCI outlet or are connected to a GFI circuit. Those that are not protected by a GFCI are being taken out of service until a GFCI outlet can be installed or the outlet removed and a cover plate installed. This entire process is scheduled for completion by March 22, 2007. The portion of the Main Interior Building that has been renovated (approximately one-third of the building) has GFCI receptacles installed where appropriate.

Item 6. *Fire doors are wedged or jammed open.*

The draft findings noted the third-floor doors in the South Interior Building were wedged or jammed open in the center section. This condition has been corrected. In addition, staff personnel have been advised to monitor this problem closely on all floors of the building and, if necessary, to remove any wedges the occupants may place to keep fire doors open. As another pre-caution, a sign has been put on the door to remind occupants that this is a fire door and that the door must be kept closed.

Item 7. *Exit signs are not illuminated or are missing.*

All exit signs have been checked for proper operation. This includes replacing burned-out bulbs and batteries. This work was completed on March 2, 2007. On-going inspections will become a part of routine building maintenance operations to keep exit signs in proper working order. A comprehensive survey to determine where additional

exit signs may be needed is scheduled to be completed by April 12, 2007, and action on the findings of the survey will be taken without delay.

Item 8. *Computer server area has a piece of paper taped over it.*

There is a computer room in the Main Interior Building that contains two doors. One of these doorways leads into an area under construction and is not operational. The exit sign over the door was covered and there was no sign on the door indicating it was not an exit. A sign to indicate the door is "NOT AN EXIT" was placed on the door on February 27, 2007. This action corrected this finding.

Finally, copies of your letter have been posted in several publicly-accessible locations throughout the Interior Complex and the Unions have been notified. Copies of this response will also be provided to the Unions and made available for the employees as well.

If you have any questions please contact me at (202) 208-6254.

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas J. Bourgeois". The signature is fluid and cursive, with the first name "Douglas" and last name "Bourgeois" clearly distinguishable.

Douglas J. Bourgeois
Director
National Business Center

Enclosure

Attachment A

**CERTIFICATE OF POSTING
OSHA NOTIFICATION OF ALLEGED HAZARD(S)**

Complaint Nr: 202010633

Date of Posting: March 2, 2007

Date Copy Given to
An Employee Representative: March 2, 2007

On behalf of the employer, I certify that a copy of the complaint letter received from the Occupational Safety and Health Administration (OSHA) has been posted in a conspicuous place, where all affected employees will have notice, or near such location where the violation occurred, and such notice has been given to each authorized representative of affected employees, if any. This notice was or will be posted for a minimum of ten (10) working days or until any hazardous conditions found are corrected.



Paul M. Cyr
Chief, Division of Facilities Management Services
National Business Center